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Nuclear Services

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01-IHSEC-RGC-006

March 7, 2001

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U. S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Attention: Dr. Ronald R. Bellamy, Chief
Decommissioning and Laboratory Branch
Division of Nuclear Materials Safety

Subject: Inspection Report 0700698/2000001
Westinghouse Electric Company, Waltz Mill Site, Madison, PA
License Number: SNM-770
Docket Number: 07000698

Dear Dr. Bellamy:

Westinghouse Electric Company LLC (Westinghouse) hereby submits the following requested information in response to the two issues raised by the NRC during a safety inspection of interior and exterior decommissioning activities being conducted under License No. SNM-770 at the Waltz Mill Site from August 7, 2000 to December 14, 2000. These issues are documented in NRC Inspection Report 07000698/2000001, dated February 7, 2001.

1. NRC Issue

The licensee established a training program that met the requirements of 10 CFR 19.12. However, the inspection revealed that aspects of the licensee's program were weak pertaining to training and retraining of radiation workers. Interviews with field personnel revealed a lack of knowledge of the policies and standard operating procedures related to internal dose, administrative dose limits and regulatory limits. Based on discussions of this issue with the work foremen and several of the craft workers, the inspectors determined that the dose extension policy was not well understood by the workers and that the supervisors had not explained the policy adequately.

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Westinghouse Response

Although not required by SNM-770 License or NRC regulations, Westinghouse has established tiered administrative dose limits at fractions of the NRC regulatory limits to ensure the regulatory limits are not exceeded and to manage the rate of worker dose accumulation to ensure exposures are maintained ALARA. Written worker dose extensions are issued to extend the worker to the next administrative level. The process is intended to ensure that the supervisor, radiation worker and RSO are clearly informed of the need to extend the worker to the next administrative level. All radiation workers receive training on both NRC mandated dose limits and the Westinghouse administrative dose limits as part of their initial and annual refresher radiation safety training. At completion of training, a written test is given to ensure each worker masters the training objectives.

The possibility that there might be some lack of clarity in the understanding of worker dose extensions was first brought to the attention of Westinghouse Waltz Mill Remediation Project ("Project") management on August 14, 2000. On this day, four Washington Group International (WGI) craft workers assigned to the Project expressed concerns to WGI management when asked to sign dose extensions. Although explanations were provided to the workers by WGI management and the dose extensions were signed, these workers continued to have questions about the dose extension policy. As a result, additional corrective actions were put into place to address this issue with all Project workers.

Initially, Project and Westinghouse management reviewed the rationale behind the Westinghouse dose extension policy and implementing procedures and determined that no revisions to the policy or procedures were necessary. However, it was determined that WGI would prepare a written dose extension policy that would become part of the WGI Project specific Procedures Manual. This policy is to provide a clear explanation of the purpose of a dose extension, ALARA and other considerations for establishing Project administrative limits. The policy also provides definitions for Project, site and federal dose limits; responsibilities associated with implementation of the dose extension policy; and steps required to implement the policy. The WGI dose extension policy was implemented on November 14, 2000.

On November 15, 2000, a training session on the new WGI dose extension policy was held for all WGI craft and supervisory personnel. A Westinghouse health physics supervisor, who had made successful presentations to the workers in the past, presented the policy. Sufficient time was allocated for questions and answers. Follow-up discussions with various workers by WGI project management indicated that the policy is understood.

In addition, it was determined that Project first line supervisors needed to exhibit greater sensitivity in responding to worker questions concerning radiation protection and safety. Thus, in addition to the specific actions taken to address better worker understanding of the dose extension policy, all Project supervisors, i.e., WGI superintendents and foremen, Westinghouse Project management, and GTS Duratek field supervisors, participated in two special, supplemental training courses. The first training course, titled "Supervisor Training: Assuring a Safety Conscious Work Environment," was held October 15, 2000 and consisted of a 3-hour morning session and a 3-hour afternoon session. The second training session, titled "Managing Employee Issues Workshop," was held December 12, 2000 and also consisted of two 3-hour

sessions. This workshop was more hands on and dealt with specific methods to more effectively communicate with subordinates.

In conclusion, while the dose extension process was confirmed to contribute to ALARA and overall worker radiation safety, it initially may not have been fully understood by some of the Project personnel. It also was recognized that Project supervision had not received specific training on dealing with questions on dose extensions and related radiation matters. Upon identification, full and effective corrective actions were taken, i.e., a clear dose extension policy was issued; and a special training session was held on the dose extension policy. In addition, Project supervisors received supplemental training in interacting with employees and successfully addressing worker issues and questions in the area of radiation limits and safety.

2. NRC Issue

Interviews with numerous radiation workers about radiation protection issues revealed that some workers were not comfortable raising questions, concerns or discussing radiation protection issues with their management.

Westinghouse Response

It is Westinghouse's long-standing policy that all employees of Westinghouse, and of its contractors and subcontractors, are free to raise safety concerns without fear of retaliation; and that such safety concerns are promptly reviewed, investigated as necessary and resolved with timely feedback to the concerned individual. Westinghouse's commitment to maintaining a safety conscience work environment was recently reaffirmed by the July 1, 2000 reissuance, in an updated and revised form, of the Westinghouse Policy "Dealing with Safety Concerns." A copy of the reissued policy was provided to all Westinghouse employees and personnel of Westinghouse contractor organizations. In addition, the policy is made readily available to all workers through bulletin board postings and through the Westinghouse Intranet.

The Westinghouse policy encourages all workers to inform their immediate manager, or other appropriate management personnel, of any safety concerns that they may have so that appropriate actions can be taken. The policy establishes guidelines for Westinghouse management to receive, document, investigate, and respond to raised safety concerns. It is intended to ensure that issues relating to safety can be raised by employees of Westinghouse and its contactors without fear of harassment, retaliation, intimidation or reprisal and that issues receive prompt and appropriate attention. The policy further states that any action constituting harassment, retaliation, intimidation or reprisal against individuals raising safety concerns in good faith under the policy will not be tolerated. The policy also requires contractor organizations to inform Westinghouse management of their receipt of any safety concerns raised by their personnel, or any allegation of discrimination, harassment, or other retaliation directed against their personnel as a result of raising such concerns, in order for Westinghouse to ensure a full evaluation and, as appropriate, investigation of such concerns or allegations. Furthermore, the policy requires the contractor organization to fully cooperate with Westinghouse in the conduct of any required evaluation.

With this background in mind, Westinghouse Waltz Mill Site management and Project management have conducted reviews and taken additional actions to ensure that

Westinghouse's commitment to a safety conscious work environment applies equally to the Project as it does throughout the Westinghouse organization, and that there are adequate means available to Project workers to raise and have their safety concerns addressed. Specifically, Westinghouse and Project management have: 1) reviewed the adequacy of Project policies and procedures to ensure employees have adequate direction and resources with which to report safety and compliance issues, 2) conducted training to continually promote a safety-conscious work environment and stress the importance of raising safety concerns, 3) sponsored an independent review of radiological safety and safety conscious work environment programs used by the Project, and 4) established a Quality Circle to address employee concerns. The following is a summary of these actions and their effectiveness in enabling Project workers to freely and openly raise or discuss radiation safety questions, concerns or issues.

A. Policies and Procedures Review

In addition to the Westinghouse Policy "Dealing with Safety Concerns", two sections in the WGI Project specific Procedures Manual deal with the commitment to a safety conscious work environment and an effective employee concerns policy: Manual Section 4 addresses "Assuring a Safety Conscious Work Environment," and Manual Section 5 establishes procedures for "Employee Open Communications and Condition Evaluation Requests." These two sections of the WGI Project specific Procedures Manual apply to all Project personnel. These Manual Sections are included as part of the initial and renewal training provided to all Project personnel.

Manual Section 4, "Assuring a Safety Conscious Work Environment," clearly states that any employee is free to raise questions or concerns relative to nuclear safety without fear of retaliation, including discrimination, harassment, or intimidation. It defines harassment, intimidation, discrimination, and a protected employee per 10 CFR 50.7 "Employee Protection." It defines responsibilities and presents the Project implementation procedure.

Manual Section 5, "Employee Open Communication and Condition Evaluation Requests," provides multiple implementing paths for employees to discuss concerns relative to their health, safety, nuclear safety, and welfare with project management. Personnel are encouraged to first address improvements or adverse conditions with their immediate supervisor or the WGI Safety Supervisor. Alternatively, an employee may submit an issue through an open communication request form, which can be submitted anonymously. Any safety concern that arises through this WGI process must also be brought to Westinghouse's attention to ensure that the concern is adequately resolved to the satisfaction of the licensee under its policy on "Dealing with Employee Concerns".

In addition, both Project contractor organizations (WGI and GTS Duratek) have established procedures designed to solicit comments from workers whose jobs are terminating due to completion of Project tasks or who otherwise leave the Project. Exit interviews are conducted by the hiring contractor organization to determine if the worker has any unresolved industrial, radiation safety or other concerns. This process serves to alert management to any employee concerns that might not have been raised during their employment, but which nonetheless require management attention for the safety and welfare of continuing workers.

Based on the review of Project policies and procedures, it is concluded that Project workers are provided multiple options for raising concerns. Among these options are well defined processes for Project workers, if they so choose, to raise concerns through channels other than their immediate supervisor or manager.

B. Training

As previously noted, all Project workers, supervisors and management receive training to the Westinghouse policy and above-described Manual Sections prior to performing any work at the Project. This also is a subject of the workers' formal annual retraining. Material from the Project procedures is covered in the test that all must pass at the conclusion of both the initial and annual refresher training. The ability to freely raise employee concerns has also been the subject of other formal and informal training during the course of the Project. By way of an example, the following is a summary of the documented employee concerns training conducted for Project workers during the period encompassed by the NRC's inspection.

- July 4, 2000 - Annual Refresher Training during site shutdown week.
- July 31, 2000 - Tool Box training on the Westinghouse policy on "Dealing with Safety Concerns" to make workers aware of Westinghouse's program and safety concerns hotline. Westinghouse policy posted in all worker areas.
- September 18, 2000 - Tool Box training on the WGI Employee Concerns Program.
- October 5, 2000 - All hands training on safety conscious work environment.
- October 5, 2000 - Supervisor and foreman formal training entitled "Assuring a Safety Conscious Work Environment."
- October 30, 2000 - Tool Box training on the Westinghouse policy on "Dealing with Safety Concerns."
- November 15, 2000 - WGI craft and supervisor training on the WGI Dose Extension Policy.
- December 4, 2000 - Tool Box training on stop work authority.
- December 12, 2000 - Supervisor and foreman training workshop entitled "Safety Conscious Work Environment—Managing Employee Issues." This was a follow-up to the October 5, 2000 supervisor training session with emphasis on techniques for interfacing with employees.

C. Independent Review Assessing Safety Conscious Work Environment

On March 22-23, 2000, representatives from GTS Duratek, WGI, and Westinghouse, not directly assigned to the Project, audited selected areas of the Project's radiation safety and safety conscious work environment programs. An audit report was issued on April 19, 2000. The report concluded:

> *"The project has numerous methods established to allow employees at all levels of the organization to report concerns. While, in some cases, the employees may not have been fully aware of all of the methods available, they were all trained to the WGI project specific procedures and had ample opportunity to report their concerns. The process that is established allows for anonymous reporting, which in itself should alleviate any fear of retaliation. Additionally, an all hands meeting was held on the morning of March 23, 2000. The purpose of the meeting was to allow the Health Physics supervision to explain to the workers the events surrounding the unexpected discovery of the Strontium source and the problems that ensued. The presentation was followed by a question and answer session, during which numerous craft asked some very pointed questions clearly indicating that there is not a chilled atmosphere at Waltz Mill and that employees feel free to air concerns. The audit team firmly believes that a safety conscious work environment does exist at the site and that workers feel free to raise safety concerns."*

The audit report contained thirty-six recommendations, eleven of which dealt specifically with safety conscious work environment and communicating site policies. All recommendations but one (distribution of hats, etc. to promote the employee concerns program) have been implemented.

D. Quality Circle

The "Quality Circle" was one of the recommendations from the independent audit discussed above. A monthly meeting is held with representatives from the craft workers, health physics technicians, safety, engineering, and project management. The meeting is specifically to address safety concerns, but generally covers a full range of issues from safety issues to general comments. The safety supervisor maintains a log of the meeting so that action items can be tracked. The WGI Project Manager, Safety Supervisor, Interface Coordinator, and jobsite representative attend all meetings. The craft and radiation protection technicians are rotated through from different work areas so that a representative sampling of the Project is in attendance at each meeting. Discussions have been very open, and management has responded appropriately to issues raised during such meetings and in a timely manner.

Conclusion

Westinghouse trusts that the foregoing information provides sufficient information to the NRC to demonstrate Westinghouse and Project management's commitment to ensuring that a safety conscious work environment exists at the Project site and that no chilling effect exists in the ability of employees to raise safety and compliance concerns within their own or licensee organizations.

If you have any questions concerning this information, please contact me at the above address or by telephone at (724) 722-5757.

Sincerely,

R.G. Cline, Manager
Industrial Hygiene, Safety, and Environmental Compliance

cc:

Wayne Vogel, Radiation Safety Officer
Waltz Mill Site, Westinghouse Electric Company